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QUALIFIED MEDIATOR

• L.L.M. IN TAXATION

July 27, 2022

BY ELECTRONIC FILING

Magistrate Judge José R. Almonte

United States Magistrate Judge for the District of New Jersey

Martin Luther King Building & U.S. Courthouse

50 Walnut Street, Room PO 9

Newark, NJ 07101

**Re: Garreffii v. Hicks, et al.
Case No: 2:20-cv-16396-MCA-MAH**

Dear Judge Almonte:

The parties submit this status letter in anticipation of the conference August 10, 2022. On June 27, 2022 the Court issued its Order and Opinion on the Rule 12(b)(6) Motion [DE 62]. Although permission was given to amend the Second Amended Complaint as to Count VII, the civil conspiracy count dismissed Without Prejudice, plaintiff has determined not to file a further Amended Complaint at this time. On July 14, 2022 an Answer was filed by the eleven (11) defendants [63].

With the exception of service of the defendants' Rule 26 disclosures, no substantive discovery has yet been engaged in. The agreement to engage in discovery prior to the inclusion of all defendants and determination of the Motion would have resulted in re-answering of interrogatories and notice to produce at different junctures in the litigation. Counsel is prepared to proceed, have conferred and request the following schedule:

Written discovery including any Rule 26 disclosures to be propounded by August 30, 2022;

Written discovery to be answered by November 15, 2022;

Discovery disputes to be put before the Court in a joint letter by December 31, 2023;

Fact discovery to be completed by March 31, 2023;

A conference is to be scheduled for _____.

Respectfully submitted,



SHELLEY L. STANGLER, ESQ.

SLS/mf
Enc.

cc: Chanell Marie Branch, DAG, via email: Chanell.Branch@law.njoag.gov